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November 19, 2024

BY ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *M.H., individually, and on behalf of her child, A.A., a minor v. New York City
Department of Education and David C. Banks, 24-cv-3608-PAE*

Dear Judge Engelmayer:

I am the Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendants the New York City Department of Education and David C. Banks in the above-referenced action. I write, with Plaintiffs' consent, to respectfully request a 90-stay of this action.

As the parties noted in their joint letter dated August 19, 2024, the parties have resolved Plaintiffs' cause of action seeking enforcement of the administrative decision below. *See* Dkt. No. 12. Therefore, Defendants requested, with Plaintiffs' consent, a further extension of 90 days to respond to the Complaint, from August 21, 2024 to November 19, 2024, so that the parties could continue their cooperative efforts and attempt to resolve Plaintiffs' attorneys' fees cause of action without need to burden the Court's resources. *Id.* By Order dated August 22, 2024, Your Honor granted that request. *See* Dkt. No. 13. Since that time, the undersigned has requested Plaintiffs' counsel's billing records. This Office has not yet received such records. However, earlier today, Plaintiffs' counsel informed the undersigned that they will provide their settlement demand and supporting documents by November 24, 2024. Accordingly, Defendants respectfully request that this matter be stayed for approximately¹ 90 days, until February 24, 2025, during which time this Office would analyze, and the parties would endeavor to resolve, Plaintiffs' remaining demand. Plaintiffs consent to this request.

¹ Exactly 90 days from November 24, 2024 would be February 22, 2025, a Saturday.

Accordingly, with Plaintiffs' consent, Defendants' respectfully request a stay of this matter of approximately 90 days, until February 24, 2025. This is Defendants' first request for a stay. If granted, this request would not impact any other scheduled dates.

Thank you for Your Honor's consideration of this request.

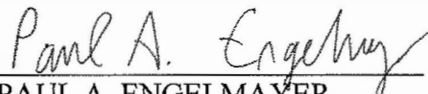
Respectfully,

/s/ _____
Darian Alexander
Assistant Corporation Counsel

CC: BY ECF
all counsel of record

GRANTED.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

November 20, 2024
New York, New York